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Attorneys for Motion Picture Association, Inc.

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

12 In Re 17 U.S.C. § 512(h) Subpoena to  
13 TONIC DOMAINS CORPORATION

Case Number: 2:23-mc-00059

**DECLARATION OF JAN VAN  
VOORN IN SUPPORT OF  
ISSUANCE OF SUBPOENA  
PURSUANT TO 17 U.S.C. § 512(h)**

I, Jan van Voorn, the undersigned, declare that:

1. I am Executive Vice President and Chief of Global Content Protection for the Motion Picture Association, Inc. (“MPA”). I submit this declaration on behalf of Disney Enterprises, Inc. and Warner Bros. Entertainment, Inc. (“ACE Members”), each of which is a member of the Alliance for Creativity and Entertainment (“ACE”). ACE is a global coalition of leading content creators and on-demand entertainment services committed to supporting the legal marketplace for video content and addressing the challenge of online piracy. The ACE

1 Members, whether themselves or through subsidiaries and affiliates, own the  
 2 copyrights in the below referenced copyrighted works.

3       2. The ACE Members (via the Motion Picture Association, Inc.) are  
 4 requesting issuance of the attached proposed subpoena that would order Tonic  
 5 Domains Corporation to disclose the identities, including names, physical addresses,  
 6 IP addresses, telephone numbers, e-mail addresses, payment information, account  
 7 updates and account histories of the users operating the following websites:

No	Domain	Infringed Title 1	Infringing URL 1	Infringed Title 2	Infringing URL 2
1	<b>fmoviesfree.to</b>	Encanto	fmoviesfree.to/film/encanto-2021/	Tenet	fmoviesfree.to/film/tenet-2020/

12       3. The purpose for which this subpoena is sought is to obtain the identities  
 13 of the individuals assigned to these websites who have exploited ACE Members'  
 14 exclusive rights in their copyrighted motion pictures without their authorization.  
 15 This information will only be used for the purposes of protecting the rights granted  
 16 to ACE Members, the motion picture copyright owners, under Title II of the Digital  
 17 Millennium Copyright Act.

19           I declare under penalty of perjury under the laws of the United States of  
 20 America that the foregoing is true and correct to the best of my knowledge,  
 21 information or belief.

22           Executed at Redondo Beach, California, on April 10, 2023.



Jan van Voorn